

Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-25 are pending in the application, with claims 1, 13, 16, and 17 being the independent claims. Claims 5, 8, 13, 17, 20, and 25 are sought to be amended. Claim 19 is sought to be canceled without prejudice to or disclaimer of the subject matter therein. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Objection to the Specification

On page 2 of the Office Action, the discussion of the steps shown in Figure 3 are objected to as being disclosed in the reverse order. The specification and the associated drawing have been amended in light of these comments. Accordingly, it is respectfully requested that the objection to the specification be withdrawn.

Rejections under 35 U.S.C. § 112

On page 2 of the Office Action, claims 8 and 25 were rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regard as the invention. Claims 8 and 25 have been amended in light of the specific comments of the Office Action.

Accordingly, Applicants respectfully request the Examiner reconsider and withdraw the rejection of claims 8 and 25 under 35 U.S.C. § 112, second paragraph.

Rejections under 35 U.S.C. § 102

The rejections of claims 1, 4-6, 10-13, and 16 under 35 U.S.C. § 102(e), as allegedly being anticipated by U.S. Patent Application No. 2005/0114239 to Fiascone *et al.* (hereinafter Fiascone), are respectfully traversed.

With regard to claims 1, 4-6, and 10-12, claim 1 recites, *inter alia*, "...transmitting a standardized template...;...receiving remote financial data...via the standardized template;...[.]" Fiascone does not disclose "transmitting a standardized template" such that the "receiving [of] remote financial data" is "via the standardized template." There are chronological differences between Fiascone and the Applicants' embodied claims such that Fiascone cannot disclose the features of Applicants' embodied claims. Specifically, Fiascone discloses receiving exchange account data (see paragraph 0019) and then transforming said data into a common format (see paragraph 0021). Once the data is in a common format, it is matched against master financial data, discrepancies are identified, and a report is generated showing the discrepancies. (See paragraphs 0023-0025). In order to correct the discrepancies, an adjustment page of Fiascone, which the Examiner equates to a standardized template (Office Action page 3, the Examiner points to Figs. 4 and 5 as the standardized template) is presented to the user at the remote terminal in order to make adjustment to the financial data. (See paragraphs 0026-0028). Thus, it is obvious from the above synopsis and also upon closer review of the cited reference, that Fiascone only teaches a standardized template generated from the transformed, matched, reconciled, and reported data of the

received remote data and not "receiving remote data...via the standardized template[.]" Fiascone discloses receiving the financial data in a way other than *via the standardized template*. Thus since in a proper § 102 rejection, the cited reference must disclose each and every element of the embodied claim, the rejections against claims 1, 4-6, and 10-12, cannot stand.

Further, since claims 4-6 and 10-12 are dependent from claim 1, it is respectfully submitted that each of claims 4-6 and 10-12 are patentably distinct over Fiascone for the same reasons as discussed *supra* and in further view of their additional features.

For at least these reasons, Applicants respectfully request that the 35 U.S.C. § 102(e) rejections be removed from claims 1, 4-6, and 10-12 and that these claims be allowed.

On page 4 of the Office Action, "the Examiner interprets a standardized template as a webpage or web browser which is operable on a plurality of operating." While Applicants agree that the standardized template might manifest itself as a webpage or web browser, Applicants advance that this is only one of a plurality of manifestations of a standardized template that are contemplated by the disclosure. This assertion is supported by the specification at paragraph [0030], which by way of example and in no way limiting, lists several platforms for the standardized template: Internet Explorer, Visual Basic, Microsoft Word, Lotus Notes, and Java among others.

With regard to claim 13, there exists the same chronological difference between Fiascone and the Applicants' embodied claims as there was in claim 1. Claim 13 recites, *inter alia*, "receiving transaction data from a remote terminal *via a standardized template*[" As has already been discussed, the chronological flow of Fiascone does not disclose receiving the data *via a standardized template*, because the standardized template is not created until

after the data has been converted, matched, reconciled, and reported. For at least these reasons, Applicants respectfully request that the 35 U.S.C. § 102(e) rejection be removed from claim 13 and that this claim be allowed.

With regard to claim 16, again there is the same chronological difference between Fiascone and the Applicants' embodied claims as there was in claim 1. In claim 16, data is first converted using a standardized template. The converted data is then transmitted to a reconciliation system. As detailed above, the standardized template of Fiascone is not created until after data is received, transformed, matched, identified, and reported. The data transmitted in Fiascone is therefore not "converted transaction data" as recited in claim 16. Claim 16 clearly states that the data is stored, the stored data is converted using the standardized template, and then the converted data is transmitted. Thus Fiascone does not disclose using a standardized template to convert data before transmission as in claim 16. For at least these reasons, Applicants respectfully request that the 35 U.S.C. § 102(e) rejection be removed from claim 16 and that this claim be allowed.

Rejections under 35 U.S.C. § 103

The rejections of claims 2 and 3 under 35 U.S.C. § 103(a), as allegedly being unpatentable over Fiascone in view of U.S. Patent No. 5,392,390 to Crozier (hereinafter Crozier), are respectfully traversed.

As explained, *supra*, claim 1 is neither anticipated nor unpatentable over Fiascone. Crozier does not overcome the deficiencies of Fiascone. Claims 2 and 3 depend directly from claim 1 and recite further unique features of the claimed invention. Thus, Applicants submit

that since dependent claims 2 and 3 implicitly contain the elements of independent claim 1, these claims are likewise patentable over Fiascone in view of Crozier.

The rejection of claim 7 under 35 U.S.C. § 103(a), as allegedly being unpatentable over Fiascone in view of U.S. Patent Application No. 2003/0229541 to Randall *et al.* (hereinafter Randall), is respectfully traversed.

As explained, *supra*, claim 1 is neither anticipated nor unpatentable over Fiascone. Randall does not overcome the deficiencies of Fiascone. Claim 7 depends directly from claim 1 and recites further unique features of the claimed invention. Thus, Applicants submit that since dependent claim 7 implicitly contains the elements of independent claim 1, this claim is likewise patentable over Fiascone in view of Randall.

The rejection of claim 8 under 35 U.S.C. § 103(a), as allegedly being unpatentable over Fiascone in view of U.S. Patent Application No. 2005/0044015 to Bracken *et al.* (hereinafter Bracken), is respectfully traversed.

As explained, *supra*, claim 1 is neither anticipated nor unpatentable over Fiascone. Bracken does not overcome the deficiencies of Fiascone. Claim 8 depends directly from claim 1 and recites further unique features of the claimed invention. Thus, Applicants submit that since dependent claim 8 implicitly contains the elements of independent claim 1, this claim is likewise patentable over Fiascone in view of Bracken.

The rejections of claims 9, 14-15, 17-18, and 23 under 35 U.S.C. § 103(a), as allegedly being unpatentable over Fiascone in view of Randall, are respectfully traversed.

As explained, *supra*, claims 1 and 13 are neither anticipated nor unpatentable over Fiascone. Randall does not overcome the deficiencies of Fiascone. Claims 9, 14, and 15 depend directly from either claim 1 or claim 13 and recite further unique features of the

claimed invention. Thus, Applicants submit that since dependent claims 9, 14, and 15 implicitly contain the elements of independent claim 1 or claim 13, then these claims are likewise patentable over Fiascone in view of Randall.

Amended claim 17 recites, *inter alia*, "a capture component for receiving and storing account and transaction data *via at least one of a plurality of predefined templates* from a plurality of remote terminals[.]" As has been discussed above, Fiascone does not disclose the use of a standardized template or one of a plurality of predefined templates to *receive* data; the only arguable use of templates that Fiascone discloses is as adjustment for data that has already been converted, matched, identified, and reported. Thus amended claim 17 raises the same chronological difficulty for Fiascone as claims 1, 13, and 16. Therefore, claim 17 is neither anticipated nor unpatentable over Fiascone. Randall does not overcome the deficiencies of Fiascone. Claims 18 and 23 depend directly from claim 17 and recite further unique features of the claimed invention. Thus, Applicants submit that since dependent claims 18 and 23 implicitly contain the elements of independent claim 17, these claims are likewise patentable over Fiascone in view of Randall.

The rejections of claims 19-22 under 35 U.S.C. § 103(a), as allegedly being unpatentable over Fiascone in view of Bracken, are respectfully traversed.

Claim 19 has been canceled without prejudice to or disclaimer of the subject matter contained therein and thus renders its § 103 rejection moot. Applicants reserve the right to prosecute similar or broader subject matter in a continuing application.

As explained, *supra*, claim 17 is neither anticipated nor unpatentable over Fiascone. Bracken does not overcome the deficiencies of Fiascone. Claims 20-22 depend directly from claim 17 and recite further unique features of the claimed invention. Thus, Applicants submit

that since dependent claims 20-22 implicitly contain the elements of independent claim 17, these claims are likewise patentable over Fiascone in view of Bracken.

The rejection of claim 24 under 35 U.S.C. § 103(a), as allegedly being unpatentable over Fiascone in view of Crozier, is respectfully traversed.

As explained, *supra*, claim 17 is neither anticipated nor unpatentable over Fiascone. Crozier does not overcome the deficiencies of Fiascone. Claim 24 depends directly from claim 17 and recites further unique features of the claimed invention. Thus, Applicants submit that since dependent claim 24 implicitly contains the elements of independent claim 17, this claim is likewise patentable over Fiascone in view of Crozier.

The rejection of claim 25 under 35 U.S.C. § 103(a), as allegedly being unpatentable over Fiascone in view of Bracken, is respectfully traversed.

As explained, *supra*, claim 17 is neither anticipated nor unpatentable over Fiascone. Bracken does not overcome the deficiencies of Fiascone. Claim 25 depends directly from claim 17 and recites further unique features of the present invention. Thus, Applicants submit that since dependent claim 25 implicitly contains the elements of independent claim 17, this claim is likewise patentable over Fiascone in view of Bracken.

Accordingly, for at least the reasons given above, Applicants respectfully request that the 35 U.S.C. § 103(a) rejections be removed from claims 2-3, 7-9, 14-15, 17-18, and 20-25 and that these claims be allowed.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

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